

## ADM-PO-27 Privacy Policy

Process owner: IT

Rev 2

31 Jan 2020

### 1 Policy statement

This privacy notice applies to personal information processed by or on behalf of Drive DeVilbiss Healthcare Ltd.

### Changes to this privacy notice

We may change this privacy notice from time to time by updating this document in order to reflect changes in the law and/or our privacy practices. We encourage you to check this privacy notice for changes whenever you visit our website - [www.drivedevilbiss.co.uk](http://www.drivedevilbiss.co.uk).

### Drive DeVilbiss Healthcare Ltd and our Data Protection Officer

We are Drive DeVilbiss Healthcare Ltd, Whitehall 26 Business Park, 1 Heathfield Lane, Birkenshaw, West Yorkshire, BD11 2HW and we are a data controller of your personal data. Drive DeVilbiss Healthcare Ltd company or companies which provide you product or service are named at the start of these terms and conditions. Drive DeVilbiss Healthcare Ltd Group of companies means Drive DeVilbiss Healthcare Ltd, together with any entity in which Drive DeVilbiss Healthcare Ltd directly or indirectly has at least a 50% shareholding.

We have a dedicated data protection officer ("DPO").

You can contact the DPO by e-mailing [DataProtectionOfficer@drivedevilbiss.co.uk](mailto:DataProtectionOfficer@drivedevilbiss.co.uk) or by writing to our company address and marking it for the attention of the DPO.

### 2 What kinds of personal information about you do we process?

Personal information that we'll process in connection with all of our products and services, if relevant, includes:

- **Personal and contact details**, such as title, full name, contact details and contact details history
- **Your date of birth, gender and/or age**
- **Data that is considered as Special Category Data**, for the purpose of ensuring the correct product or service is being used and not increasing any risk to health
- **Your nationality**, if needed for the product or service
- **Records of your contact with us** such as via the phone number of our breakdown service and, if you get in touch with us online using our online services or via our smartphone app, details such as your mobile phone location data, IP address and MAC address
- **Products and services** you have purchased from us, as well as those you have expressed an interest in and the associated payment methods used
- **The usage of our products and services**, including any installations or rentals, Sales, call outs or repairs.
- **Marketing to you and analysing data**, including history of those communications, whether you open them or click on links, and information about products or services we think you may be interested in, and analysing data to help target offers to you that we think are of interest or relevance to you. Offers may include any of our products and services
- **Information about your use of products or services held with our business partners**, including any installations or rentals, Sales, call outs or repairs.
- **Personal information which we obtain from Credit Reference Agencies and Fraud Prevention Agencies**
- **Debt information**, including details of money you owe
- **Information about your health or if you are a vulnerable customer**
- **Information about your property**, such as location used for delivering products or services

### 3 What is the source of your personal information?

We'll collect personal information from the following general sources:

- From you directly,
- Information generated about you when you use our products and services
- Drive DeVilbiss Healthcare Ltd companies if you already have a product with them, have applied for one or have owned one previously
- Business partners who are a part of providing your products and services
- From other sources such as Fraud Prevention Agencies, Credit Reference Agencies, debt recovery and/or tracing agents, other organisations to assist in prevention and detection of crime, police and law enforcement agencies

### 4 What do we use your personal data for?

We use your personal data, including any of the personal data listed in section 1 and 2 above, for the following purposes:

- Assessing an application for a product or service, including considering whether or not to offer you the product or service, the price, availability of payment method and the terms
- Managing products and services
- Updating your records, and recovering debt
- Managing any aspect of the product or service
- To make automated decisions on whether to offer you a product or service, or the price, payment method
- To perform and/or test the performance of, our products, services and internal processes
- To improve the operation of our business and that of our business partners
- For management and auditing of our business operations including accounting
- To carry out checks at Credit Reference
- To monitor and to keep records of our communications with you and our staff
- For market research and analysis and developing statistics
- For direct marketing communications and related profiling to help us to offer you relevant products and service, including deciding whether or not to offer you certain products and service. We'll send marketing to you by SMS, email, phone, post, social media and digital channels. Offers may relate to any of our products and services as well as to any other offers and advice we think may be of interest
- To provide personalised content and services to you, such as tailoring our products and services, our digital customer experience and offerings, and deciding which offers or promotions to show you on our digital channels
- To develop new products and services and to review and improve current products and services
- To comply with legal and regulatory obligations, requirements and guidance
- To provide insight and analysis of our customers both for ourselves and for the benefit of business partners either as part of providing products or services, helping us improve products or services, or to assess or improve the operating of our businesses
- To share information, as needed, with business partners, service providers or as part of providing and administering our products and services or operating our business
- To facilitate the sale of one or more parts of our business
- To enable Drive DeVilbiss Healthcare Ltd companies to perform any of the above purposes

## 5 What are the legal grounds for our processing of your personal information (including when we share it with others)?

We rely on the following legal bases to use your personal data:

### 5.1 Where it is needed to provide you with our products or services, such as:

- a) Assessing an application for a product or service you hold with us, including consider whether or not to offer you the product or service, the price, the payment methods available and the conditions to attach
- b) Managing products and services you hold with us, or an application for one
- c) Updating your records, tracing your whereabouts to contact you about your account and doing this for recovering debt (where appropriate)
- d) Sharing your personal information with business partners and services providers when you apply for a product to help manage your product
- e) All stages and activities relevant to managing the product or service including enquiry, application, administration and management of accounts
- f) For some of our profiling and other automated decision making to decide whether to offer you a product and/or service, particular payment method and the price or terms of this

### 5.2 Where it is in our legitimate interests to do so, such as:

- a) Managing your products and services relating to that, updating your records, tracing your whereabouts to contact you about your account and doing this for recovering debt (where appropriate)
- b) To perform and/or test the performance of, our products, services and internal processes
- c) To follow guidance and recommended best practice
- d) For management and audit of our business operations including accounting
- e) To carry out searches at Credit Reference Agencies pre-sale, at the sale stage, and periodically after that.
- f) To carry out monitoring and to keep records of our communications with you and our staff
- g) For market research and analysis and developing statistics
- h) For direct marketing communications and related profiling to help us to offer you relevant products and services, including deciding whether or not to offer you certain products and service. We will send marketing to you by SMS, email, phone, post and social media and digital channels
- i) Subject to the appropriate controls, to provide insight and analysis of our customers to business partners either as part of providing products or services, helping us improve products or services, or to assess or to improve the operating of our businesses
- j) For some of our profiling and other automated decision making
- k) Where we need to share your personal information with people or organisations in order to run our business or comply with any legal and/or regulatory obligations

### 5.3 To comply with our legal obligations

#### 5.4 With your consent or explicit consent:

- a) For some direct marketing communications
- b) For some of our profiling and other automated decision making
- c) For some of our processing of special categories of personal data such as about your health, if you are a vulnerable customer

#### 5.5 For a public interest, such as:

Processing of your special categories of personal data such as about your health, or if you are a vulnerable customer

## 6 When do we share your personal information with other organisations?

We may share information with the following third parties for the purposes listed:

- Drive DeVilbiss Healthcare Ltd companies and service providers
- Business partners or others who are a part of providing your products and services or operating our business
- Governmental and regulatory bodies such as the Information Commissioner's Office
- Other organisations and businesses who provide services to us such as debt recovery agencies, back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions
- Credit Reference and Fraud Prevention Agencies
- Market research organisations who help us to develop and improve our products and services

## 7 How and when can you withdraw your consent?

Where we are relying upon your consent to process personal data, you can withdraw this at any time by contacting us using the details below.

## 8. Is your personal information transferred outside the UK or the EEA?

We're based in the UK but sometimes your personal information may be transferred outside the European Economic Area. If we do so we'll make sure that suitable safeguards are in place, for example by using approved contractual agreements, unless certain exceptions apply. Any data that is transferred outside of the UK will be done in full compliance with European data protection regulations.

## 9. How do we share your information with credit reference agencies?

To process your application, we may perform credit and identity checks on you with one or more credit reference agencies (CRAs). CRAs will supply to us both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

We'll use this information to:

Assess your creditworthiness and whether you can afford to take the product

Verify the accuracy of the data you have provided to us

Prevent criminal activity, fraud and money laundering

Manage your account(s)

Assess payment methods available to you

Trace and recover debts

We'll continue to exchange information about you with CRAs while you have a relationship with us. We'll also notify the CRAs about your settled accounts. If you borrow and don't repay in full and on time, CRAs will record the outstanding debt. This information may be given to other organisations by CRAs. The identities of the CRAs, their role as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in more detail on our website.

When CRAs receive a search from us they will place a search footprint on your credit file that may be seen by other lenders.

## 10. What should you do if your personal information changes?

You should tell us so that we can update our records using the details in the Contact Us section of our website. We'll then update your records if we can.

## 11. Do you have to provide your personal information to us?

We're unable to provide you with our products or services if you do not provide certain information to us. In cases where providing some personal information is optional, we'll make this clear.

## 12. Do we do any monitoring involving processing of your personal information?

In this section monitoring means any: listening to, recording of, viewing of, intercepting of, or taking and keeping records (as the case may be) of calls, email, text messages, social media messages, in person (face to face) meetings and other communications relevant to our business.

We may monitor telecommunications systems provided for use, either wholly or partially, in connection with our business. We may do this where permitted by law and we'll do this where the law requires it, or to comply with regulatory or self-regulatory rules, to prevent or detect crime, to establish the existence of facts, in the interests of protecting the security of our communications systems and procedures and for quality control and staff training purposes. This information may be shared for the purposes described above.

When you make a telephone payment using our systems, we do not record the part of the conversation that includes your bank account number, sort code or payment card details.

## 13. What about other automated decision making?

We sometimes make decisions about you using only technology, where none of our employees or any other individuals have been involved. For instance, we may do this to decide: whether to offer you a product or service, the price we will offer, what terms and conditions to offer you, or to assess what payment methods we can offer you. We may also do this using data from other parts of Drive DeVilbiss Healthcare Ltd, including product or services details.

## 14. For how long is your personal information retained by us?

Unless we explain otherwise to you, we'll hold your personal information based on the following criteria:

- For as long as is necessary to fulfil any regulatory requirements that relate to the retention of your personal information, such as requirements to retain recordings of communications made using our systems.
- For as long as we have reasonable business needs, such as managing our relationship with you and managing our operations or to communicate in relation to product recalls or training.
- For as long as we provide goods and/or services to you.

## 15. What are your rights under data protection laws?

Here is a list of the rights that all individuals have under data protection laws. They don't apply in all circumstances. If you wish to use any of them, we'll explain at that time if they are engaged or not. The right of data portability is only relevant from May 2018.

- The right to be informed about the processing of your personal information
- The right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed
- The right to object to processing of your personal information
- The right to restrict processing of your personal information
- The right to have your personal information erased (the "right to be forgotten")
- The right to request access to your personal information and to obtain information about how we process it
- The right to move, copy or transfer your personal information ("data portability")
- Rights in relation to automated decision making which has a legal effect or otherwise significantly affects you

You have the right to complain to the Information Commissioner's Office which enforces data protection laws: <https://ico.org.uk/>.

## 16. Your right to object

You have the right to object to certain purposes for processing, in particular to data processed for direct marketing purposes and to data processed for certain reasons based on our legitimate interests. You can contact us to exercise these rights.

## 17. What are your marketing preferences and what do they mean?

We may use your home address, phone numbers, email address and social media or digital channels to contact you according to your marketing preferences. You can stop our marketing at any time by contacting us or by following the instructions in the communication

### Contact Us

If you have any questions about this privacy notice, or if you wish to exercise your rights or contact the DPO, you can contact us by going to the Contact Us section of our website. Alternatively, you can write to Drive DeVilbiss Healthcare Ltd, Whitehall 26 Business Park, 1 Heathfield Lane, Birkenshaw, West Yorkshire, BD11 2HW, marking it for the attention of the DPO.

### WEBSITE COOKIE POLICY

**Our website uses cookies to help us to monitor traffic through our website using Google Analytics. All data is anonymous and no personal data is collected.**

By using our website, you consent to our use of cookies in accordance with the terms of this policy.

### About Cookies

Cookies are files, often including unique identifiers, that are sent by web servers to web browsers, and which may then be sent back to the server each time the browser requests a page from the server. Cookies can be used by web servers to identify and track users as they navigate different pages on a website, and to identify users returning to a website. Cookies may be either "persistent" cookies or "session" cookies. A persistent cookie consists of a text file sent by a web server to a web browser, which will be stored by the browser and will remain valid until its set expiry date (unless deleted by the user before the expiry date). A session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

### Cookies on our Website

Cookies on our website use the names

`__utma` `__utmb` `__utmc` `__utmz`

The cookies named `__utma` through `__utmz` come from websites that use Google Analytics, which primarily uses it to track visits.

### How we use Cookies

Cookies do not contain any information that personally identifies you, but personal information that we store about you may be linked, by us, to the information stored in and obtained from cookies.

We may use the information we obtain from your use of our cookies for the following purposes:

- (1) to track you as you navigate our website;
- (2) to analyse the use of our website;

`__utmz` stores where a visitor came from (search engine, search keyword, link)

`__utma` stores each user's amount of visits, and the time of the first visit, the previous visit, and the current visit (presumably partly for double checking of this information).

`__utmb` and `__utmc` are used to check approximately how long you stay on a site: when a visit starts, and approximately ends (c expires quickly). If you look at cookie state changes (e.g. using firecookie), you will see these changes regularly.

### Third Party Cookies

Our website does not send third-party cookies.

### Blocking Cookies

Most browsers allow you to refuse to accept cookies.

In Internet Explorer you can refuse all cookies by clicking "Tools", "Internet Options", "Privacy", and selecting "Block all cookies" using the sliding selector; In Firefox you can block all cookies by clicking "Tools", "Options", and un-checking "Accept cookies from sites" in the "Privacy" box.

In Safari you can block cookies by selecting Private browsing Blocking all cookies will, however, have a negative impact upon the usability of many websites.